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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jesus Manuel PEREZ (1)

Jose GONZALEZ-Perales (2)

Defendants.

} Magistrate Case No.: **'08 MJ 84 22**

} COMPLAINT FOR VIOLATION OF

} 21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

13 The undersigned complainant being duly sworn states:

14 On May 14, 2008, within the Southern District of California, defendants Jesus
15 Manuel PEREZ and Jose GONZALEZ-Perales did knowingly and intentionally import
16 approximately 22.60 kilograms (49.72 pounds) of cocaine, a Schedule II Controlled
17 Substance, into the United States from a place outside thereof, in violation of Title 21,
18 United States Code, Sections 952 and 960.

19 The complainant states that this complaint is based on the attached Statement
20 of Facts incorporated herein by reference.

22 *Renato Gates Rfo CAF*
23 Cole Dotson, Special Agent
24 U.S. Immigration & Customs Enforcement

25 SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 15TH,
26 DAY OF MAY 2008.

27 *Peter C. Lewis*
28 PETER C. LEWIS
29 UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Jesus Manuel PEREZ (1)
Jose GONZALEZ-Perales (2)

4 STATEMENT OF FACTS

5 This statement of facts is based on personal observation, investigation, and
6 information provided to U. S. Immigration and Customs Enforcement Special Agent
7 Dotson.

8 On May 14, 2008, at approximately 1020 hours, Jesus Manuel PEREZ and Jose
9 GONZALEZ-Perales entered the United States at the Calexico, California, West Port of
10 Entry. PEREZ was driver and registered owner of a 2000 Chrysler Sebring, bearing
11 California license plate 6AMX948. GONZALEZ was passenger of said vehicle.

12 In primary, PEREZ and GONZALEZ gave Customs and Border Protection Officer
13 (CBPO) J. Stensgard negative Customs declarations. CBPO Stensgard referred
14 PEREZ, GONZALEZ and the vehicle to the secondary lot for closer examination.

15 In the vehicle secondary lot, CBPO S. Barela utilizing a canine conducted an
16 inspection of the vehicle. The canine alerted, responding to the backseat area of the
17 vehicle.

18 A subsequent inspection of the vehicle by CBPO L. Garcia revealed 20
19 packages concealed in a non-factory compartment behind the back seat. CBPO Garcia
20 probed one of the packages and a sample of white powdery substance was obtained.
21 The sample field-tested positive for cocaine. The 20 packages had a combined net
22 weight of approximately 22.60 kilograms (49.72 pounds).

23 PEREZ and GONZALEZ were each placed under arrest and each were
24 separately advised his Rights, per Miranda. During each interview, both PEREZ and
25 GONZALEZ acknowledged his rights, waived his rights, and agreed to answer
26 questions.

27 During the PEREZ interview, PEREZ stated to Special Agent Dotson stated he
28 thought the vehicle contained 20 kilograms of marijuana. PEREZ stated was to be paid
29 \$1,500.00 to take the vehicle to the "hotel near the carwash" in Calexico, CA. PEREZ

1 and GONZALEZ are friends, and they spend time together. PEREZ stated GONZALEZ
2 called him yesterday to arrange a ride to GONZALEZ' Probation Officer's office in El
3 Centro. PEREZ picked GONZALEZ up from GONZALEZ' girlfriend's house this
4 morning (05/14/2008).

5 During the GONZALEZ interview, GONZALEZ denied knowledge of any illegal
6 substance in the vehicle. GONZALEZ stated he had never seen the vehicle before
7 today (05/14/2008). GONZALEZ stated they are only roommates and they don't see
8 each other much. GONZALEZ rarely calls PEREZ on the phone. The last time
9 GONZALEZ called PEREZ was last week. GONZALEZ and PEREZ happened to meet
10 each other as GONZALEZ was going to the bus station in order to see his Probation
11 Officer. PEREZ offered GONZALEZ a ride instead.

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